

MKP  
F.#2017R01840

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

KEITH RANIERE,  
CLARE BRONFMAN,  
ALLISON MACK, and  
KATHY RUSSELL,

Defendants.

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[PROPOSED]  
EXTENSION OF THE PROTECTIVE  
ORDERS

18-CR-204 (NGG) (S-2)

Application having been made by the UNITED STATES OF AMERICA, with the consent of counsel for the defendants, for an order extending the Protective Orders (ECF Dkt. Nos. 85 and 104), and full consideration having been given to the matters set forth therein:

IT IS HEREBY ORDERED that, in addition to applying to “Discovery Materials” (as that term is defined in the Protective Orders), the Protective Orders shall also apply to all material disclosed by the UNITED STATES OF AMERICA to counsel for the defendants pursuant to 18 U.S.C. § 3500 and/or Giglio v. United States, 405 U.S. 150 (1972).

Dated: Brooklyn, New York  
April \_\_, 2019

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THE HONORABLE NICHOLAS G. GARAUFIS  
UNITED STATES DISTRICT JUDGE  
EASTERN DISTRICT OF NEW YORK